

1 JOSEPH P. RUSSONIELLO (CSBN 44332)  
 2 United States Attorney  
 2 JOANN M. SWANSON (CSBN 88143)  
 Chief, Civil Division  
 3 MELANIE L. PROCTOR (CSBN 228971)  
 Melanie.Proctor@usdoj.gov  
 4 Assistant United States Attorney

5 450 Golden Gate Avenue, Box 36055  
 San Francisco, California 94102-3495  
 6 Telephone: (415) 436-6730  
 FAX: (415) 436-6927

7 Attorneys for Defendants

8  
 9 UNITED STATES DISTRICT COURT  
 10 NORTHERN DISTRICT OF CALIFORNIA  
 11 OAKLAND DIVISION

12 VICTORIA VAINSHTOK, ) No. C 08-1381 WDB  
 13 Plaintiff, )  
 14 v. ) **STIPULATION TO EXTEND DATE OF**  
 15 Department of Homeland Security, ) **CASE MANAGEMENT CONFERENCE;**  
 Michael Chertoff, Secretary, et al., ) **AND [PROPOSED] ORDER**  
 16 Defendants. )  
 17 \_\_\_\_\_ )

18 Plaintiff, by and through her attorney of record, and Defendants by and through their  
 19 attorneys of record, hereby stipulate, subject to the approval of the Court, to the following:

20 1. Plaintiff filed this action on or about March 11, 2008. Defendants' response is due on  
 21 May 16, 2008.

22 2. Pursuant to this Court's March 11, 2008 Order Setting the Case Management Conference,  
 23 the parties are required to file a joint case management statement on June 11, 2008, and attend a case  
 24 management conference on June 18, 2008.

25 3. In order to allow sufficient time for Defendants to consider an alternative resolution to  
 26 this case and/or Answer and prepare a joint case management statement, the parties hereby  
 27 respectfully ask this Court to extend the dates in the Court's scheduling order as follows:

28  
 STIP TO EXTEND  
 No. C 08-1381 WDB

1 Last day to file Defendants' Answer: July 8, 2008  
2 Last day to file Joint ADR Certification: July 22, 2008  
3 Last day to file/serve Joint Case Management Statement: July 29, 2008  
4 Case Management Conference: August 12, 2008, at 4:00 p.m.

5

6 Dated: May 16, 2008 Respectfully submitted,

7 JOSEPH P. RUSSONIELLO  
8 United States Attorney

9 \_\_\_\_\_/s/  
10 MELANIE L. PROCTOR<sup>1</sup>  
11 Assistant United States Attorney

12

13 Dated: May 16, 2008 \_\_\_\_\_/s/  
14 GERI N. KAHN  
15 Attorney for Plaintiff

16 **ORDER**

17 Pursuant to stipulation, IT IS SO ORDERED.

18

19 Date: May 20, 2008

20   
WAYNE D. BRAZIL  
United States Magistrate Judge

21

22

23

24

25

26

27

28 <sup>1</sup>I, Melanie L. Proctor, hereby attest that I have on file all holograph signatures for any  
signatures indicated by a "conformed" signature (/S/) within this efiled document.